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**VIA ECF**

Hon. Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., New York, NY 10007

Magistrate Judge Debra Freeman  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., New York, NY 10007

Re: LTS Management Company, LLC v. Shah 1:20-cv-04227-AT

Your Honors:

The law firm of Rivkin Radler, LLP is counsel to LTS Management Company, LLC (“Plaintiff”) in connection with the above-referenced action.

I write jointly with Defendant Rashid Ali Shah’s counsel and pursuant to Judge Torres’ Individual Practices, Section I.C. to respectfully request a brief adjournment of the preliminary conference currently scheduled for August 6, 2020 and an extension of time to submit a joint letter and case management plan currently due on July 30, 2020.

As “So Ordered” by Judge Torres on June 25, 2020, the time for Defendant to serve his responsive pleading was extended to August 7, 2020. Accordingly, the Parties respectfully request that the joint letter and case management plan be extended to a date after the Defendant has served his responsive pleading. Therefore, we respectfully request that the joint letter and case management plan currently due on July 30, 2020 be extended to and include August 10, 2020 and that the preliminary conference be adjourned to a date thereafter that is convenient for the Court. There have been no previous requests to extend the time to submit the joint letter and case management plan or to adjourn the preliminary conference and I write with consent of Defendant’s counsel.

GRANTED. The initial pretrial conference scheduled for August 6, 2020 is ADJOURNED to **August 19, 2020**, at **10:40 am**. By **August 11, 2020**, the parties shall submit their joint status letter and proposed case management plan.

Respectfully submitted,

RIVKIN RADLER LLP

/s/

Kenneth A. Novikoff

SO ORDERED.

ANALISA TORRES  
United States District Judge

Dated: August 5, 2020  
New York, New York